

TAB 6

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

	x	
	:	
THE CITY OF HUNTINGTON,	:	Civil Action
	:	
Plaintiff,	:	No. 3:17-cv-01362
	:	
v.	:	
	:	
AMERISOURCEBERGEN DRUG	:	
CORPORATION, et al.,	:	
	:	
Defendants.	:	

	x	
	:	
CABELL COUNTY COMMISSION,	:	Civil Action
	:	
Plaintiff,	:	No. 3:17-cv-01665
	:	
v.	:	
	:	
AMERISOURCEBERGEN DRUG	:	
CORPORATION, et al.,	:	
	:	
Defendants.	:	

BENCH TRIAL - VOLUME 27
BEFORE THE HONORABLE DAVID A. FABER, SENIOR STATUS JUDGE
UNITED STATES DISTRICT COURT
IN CHARLESTON, WEST VIRGINIA

JUNE 15, 2021

1 Dr. McCann's analysis that's been admitted as P-447113.

2 Okay. So, again, what Dr. McCann did here is that he
3 used ARCOS data. You can see that -- maybe you can see that
4 source down in the corner, right, Ms. Keller?

5 **A.** Yes.

6 **Q.** Okay. And what he did was calculate all distributions
7 by all distributors for 14 opioid medications into Cabell
8 and Huntington from 2006 through 2014.

9 Now, I'd ask you to look -- come all the way over here
10 in the corner at his Cabell-Huntington analysis and can you
11 see that what Dr. McCann calculated was an average of 142.19
12 dosage units shipped per capita in Cabell County, correct?

13 **A.** I see that there.

14 **Q.** Okay. So, let's just compare that to your analysis.
15 Okay. So, Dr. McCann looked at distributions from ARCOS and
16 he concluded that the distribution showed 142.19 pills per
17 person, correct?

18 **A.** Correct.

19 **Q.** Now, do you have any quarrel, Ms. Keller, with the
20 observation that your per capita prescription analysis and
21 Dr. McCann's per capita distribution analysis come within
22 one pill of each other over this nine-year period?

23 **A.** That's what the math is, yeah.

24 **Q.** That's what the math shows. So, the IQVIA prescription
25 data and the ARCOS distribution data get us to the same